

MARK E. FERRARIO  
Nevada Bar No. 1625  
TYLER R. ANDREWS  
Nevada Bar No. 9499  
ALAYNE M. OPIE  
Nevada Bar No. 12623  
JASON K. HICKS  
Nevada Bar No. 13149  
**GREENBERG TRAUIG, LLP**  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773  
Fax: (702) 792-9002  
Email: [ferrariom@gtlaw.com](mailto:ferrariom@gtlaw.com)  
[andrewst@gtlaw.com](mailto:andrewst@gtlaw.com)  
[opiea@gtlaw.com](mailto:opiea@gtlaw.com)  
[hicksja@gtlaw.com](mailto:hicksja@gtlaw.com)

*Counsel for defendant SHAC LLC d/b/a Sapphire Gentlemen's Club*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ABIGAIL ORTIZ, individually and on behalf  
of herself and all others similarly situated,

Plaintiff,

v.

SHAC LLC d/b/a SAPPHIRE  
GENTLEMEN'S CLUB; and DOES 1 to 10,

Defendants.

Case No.: 2:20-cv-621-KJD-BNW

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
DEFENDANT TO FILE ITS REPLY IN  
SUPPORT OF MOTION TO DISMISS**

**(First Request)**

IT IS HEREBY STIPULATED AND REQUESTED by and between Plaintiff Abigail Ortiz and Defendant SHAC LLC d/b/a Sapphire Gentlemen's Club, through their respective counsel and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, that the Court extend the deadline for Defendant to file its reply in support of its Motion to Dismiss (ECF No. 11) by two weeks, up to, and including, **August 12, 2020**.

Counsel for the parties are engaged in preliminary efforts to resolve this matter without the need for further litigation and submit this stipulation for a brief extension of time in order to facilitate those efforts, taking into account the exercise of due diligence.

This is the first stipulation for an extension of time for Defendant to submit its reply in support of its Motion to Dismiss, and it is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

Dated this 27<sup>th</sup> day of July 2020.

**PARKER COLE, P.C.**

*/s/ Kevin Cole*

MICHAEL R. PARKER, ESQ.

Admitted Pro Hac Vice

KEVIN COLE, ESQ.

Admitted Pro Hac Vice

6700 Fallbrook Avenue, Suite 207

West Hills, California 91307

GUSTAVO PONCE, ESQ.

**KAZEROUNI LAW GROUP, APC**

Nevada Bar No. 15084

6069 S. Fort Apache Rd., Suite 100

Las Vegas, Nevada 89148

*Counsel for Plaintiff*

Dated this 27<sup>th</sup> day of July 2020.

**GREENBERG TRAURIG, LLP**

*/s/ Tyler R. Andrews*

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*Counsel for defendant SHAC LLC d/b/a  
Sapphire Gentlemen's Club*

**IT IS SO ORDERED.**



UNITED STATES DISTRICT JUDGE

Dated 7/31/2020.

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10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135  
(702) 792-3773  
(702) 792-9002 (fax)